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IN THE MATTER OF:

Roslyn Lee Meredith

DEBTOR(S),

**IN THE UNITED STATES
BANKRUPTCY COURT FOR THE
DISTRICT OF NEW JERSEY**

CHAPTER 13
CASE NO. 20-20302 MBK

NOTICE OF OBJECTION

I, the undersigned, Esquire For KML Law Group, P.C., attorney for Secured Creditor **NewRez LLC d/b/a Shellpoint Mortgage Servicing**, the holder of a Mortgage on the debtors' premises at **1608 Heck Avenue Neptune, NJ 07753** hereby objects to the confirmation of the debtors' proposed Chapter 13 Plan for the following reasons:

1. The claims bar date was November 12, 2020. Secured Creditor intends to file a claim on or before the bar date with pre-petition arrears estimated at \$19,433.32.
2. Debtor's plan provides for payment in the amount of \$18,516.94 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$916.38, and does not provide sufficient funding to pay said claim.
4. Accordingly, Debtor's plan is NOT feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the debtor's plan fails to comply with 11 U.S.C. 1322 and 11 U.S.C. 1325.

In the event the debtors cure the aforesaid payments due outside the Chapter 13 Plan prior to the Confirmation Hearing, the undersigned will not appear at the Confirmation Hearing and aforesaid objections should be deemed waived.

/s/Denise Carlon , Esquire

Denise Carlon, Esquire
Brian C. Nicholas, Esquire
Attorney for NewRez LLC d/b/a Shellpoint Mortgage

Servicing

Dated: February 2, 2021